Case: 4:18-cr-00876-JAR-NCC Doc. #: 171-1 Filed: 01/10/20 Page: 1 of 4 PageID #:

COMMONWEALTH OF KENTUCKY
27<sup>TH</sup> JUDICIAL CIRCUIT
KNOX CIRCUIT COURT
FAMILY COURT DIVISION
CASE NO. 19-CI-37Q



ASHU JOSHI,

PETITIONER.

VS.



RESPONDENT,

AND THE CARE, CUSTODY AND SUPPORT OF ONE (1) MINOR CHILD

## PETITION FOR DECLARATION OF PATERNITY, CUSTODY, VISITATION AND CHILD SUPPORT

Comes now the Petitioner, Ashu Joshi, by counsel, and hereby requests an Order as follows: 1) Declaring Ashu Joshi the biological father of the minor child herein once paternity testing establishes paternity. 2) Granting the parties Joint Custody of the minor child, born xx-xx-2019, age 5 months. 3) Awarding him visitation with the minor child. 4) Declaring the parties to be married as of June 23, 2019. AND 5) Establishing child support for the minor child. In support of this Petition the Petitioner states as follows:

1. The Petitioner, Ashu Joshi, believes he is the biological father of the minor child herein and is a resident of the state of Missouri and he currently resides at 9362 Caddyshack Circle, St. Louis, Missouri 63127. The minor child is known as Joshi, born on xx-xx- 2019. The child is 5 months old.



- 2. The Respondent, is the biological mother of the minor child herein and is a resident of Kentucky and has been a resident of Kentucky for not less than one hundred eighty (180) days immediately preceding the filing of this cause of action and she currently resides as the currently resides as t
- 3. Pursuant to K.R.S. 403,420, the minor child's home state is the Commonwealth of Kentucky and specifically, Knox County, Kentucky. The child has always resided in Knox County, Kentucky. The child currently resides with the Respondent, at the Respondent, Corbin, KY 40701.
- 4. The Petitioner, Ashu Joshi requests that the Laurel Family Court order paternity testing and declare him the biological father of the minor child should said paternity test establish him as father of the minor child herein.
- The parties are the fit and proper party to share joint temporary and permanent custody of the minor child, with the parties having liberal timesharing of the minor child.
  - 6. The Petitioner, Ashu Joshi, does not oppose paying child support.
- Petitioner and Respondent are not married but participated in a solemnized ceremony of marriage on June 23, 2018 in the Commonwealth of Kentucky.
- 8. In accordance with KRS 403.838 the Petitioner gives the following information concerning the minor child:
- a. The Petitioner has not participated as a party witness or in any other capacity in any other litigation concerning custody of the same child in this or any other state.
  - b. The Petitioner has no information of any other custody proceedings

concerning the child, pending in a court of this state or any other state, other than the proceeding referenced in this Petition.

- c. The Petitioner doesn't know of any person, not a party to the proceedings, who has physical custody of the child or claims to have custody or visitations rights with respect to the child.
- 9. The best interests of the child will be served by the parties being awarded joint temporary and permanent custody of the minor child herein with the parties having liberal visitation with the minor child.

WHEREFORE, the Petitioner demands as follows:

- 1. That the Court order Paternity testing to be conducted as to the minor child and Petitioner's paternity.
- 2. That the parties be awarded joint temporary and permanent custody of the minor child, with the parties sharing liberal timesharing of the minor child;
  - 3. For the Court to approve any and all agreements that the parties enter into;
- 4. For an Order declaring the Petitioner, Ashu Joshi, as the biological and legal father of the minor child herein:
  - 5. For an order declaring the Parties to be married as of June 23, 2018.
  - 6. For any and all other relief to which the Petitioner appears entitled.

Respectfully Submitted

Attorney for Petitioner

635 Whitley Street

London, Kentucky 40743-2636

Telephone (606) 877-6677

Case: 4:18-cr-00876-JAR-NCC Doc. #: 171-1 Filed: 01/10/20 Page: 4 of 4 PageID #:

## **VERIFICATION**

I, ASHU JOSHI, has read the contents of this Petition and verify that the contents are true to the best of my recollection and ability.

**ASHU JOSHI** 

Date

STATE OF MISSOURI COUNTY OF <u>St. Lewi</u>S

Subscribed and sworn to before me by ASHU JOSHI on this the 22 day of

My Commission Expires: January 22,3021